

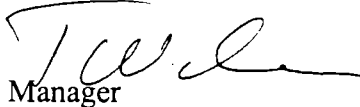


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

MEMORANDUM

DATE: SEP 30 2004

SUBJECT: Former Celotex Site, 2800 South Sacramento

FROM: Tom Williams
Remedial Project Manager 

TO: Administrative Record

The Engineering Evaluation and Cost Analysis (EE/CA) evaluated several alternatives for the former Celotex Site, at 2800 South Sacramento, Chicago IL. The EE/CA recommended a permeable soil/clay cover or a gravel cover as the remedy for the Main Site (former 24 acre industrial area). The current owner (Sacramento Corp.) installed a gravel cover with a minimum of two feet of gravel on the Main Site in 1999, except for a 2 acre parcel currently owned by the Palumbo Company.

The final clean up as outlined in US EPA's final decision document needs to meet the three criteria of effectiveness, implementability, and cost. The gravel cover alternative and the permeable soil/clay alternative equally reduce human health risks by creating a physical barrier that eliminates human health exposure if properly maintained. The human health risks associated with direct contact, ingestion and inhalation are equally eliminated by both alternatives. The cost of the gravel cover currently in place is estimated to have cost \$2,986,400, the cost of the soil/clay alternative for the same area would have been approximately \$3,610,000. Because the cost of the soil/clay cap and the gravel cap are similar and the gravel cover was already implemented, the gravel cover was not evaluated for cost in the EE/CA, but has now been added to the EE/CA as an addendum. Both are easily implementable and the time to implement the cover remedies are about the same. Also, the extension of the gravel allows for one type of cap material to be used, since the owner already covered 22 of the 24 acres with gravel. From a long-term O&M perspective having one type of cap is easier to maintain than two. Also, since the property is being used for parking, the gravel cover provides for a more beneficial reuse than a soil/clay cover which would become easily damaged and would require more maintenance if used for parking. The gravel cover on the 22 acre parcel was implemented by the current owner. The only input from U.S. EPA was that any cover would meet all Applicable or Relevant and Appropriate Requirements and is protective of human health. No official notification was made to the Sacramento Corporation other than they proceeded at their own risk and may be required to remove the gravel in the future if it conflicted with the selected remedy.

Construction of a two foot gravel cover on the remaining 2 acre property would cost approximately \$270,000. The construction cost of a permeable soil/clay cover on the remaining two acre property would cost approximately \$328,000.